

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

QUINCY ROGERS,)
Plaintiff,) Case No. 08 C 1325
v.) Judge Elaine E. Bucklo
ASHLAND INC.,) Mag. Judge Cox
Defendant.)

REPORT OF PARTIES RULE 26(f) PLANNING MEETING

1. **Meeting.** Pursuant to FED. R. CIV. P. 26(f), a meeting was held on April 2, 2008 via telephone and was attended by:

Josh Friedman, Counsel for the Plaintiff

Victor Pioli, Johnson & Bell, Ltd., Counsel for the Defendant, Ashland Inc.

Kathleen Carnes, Of Counsel for the Defendant, Ashland Inc.

2. **Pre-trial Schedule.** The parties jointly propose to the court the following discovery plan:

a. Discovery will be needed on the following subjects: (brief description of subjects on which discovery will be needed).

The parties will need conduct discovery on all issues related to the claims in Plaintiff's Complaint and the defenses in Defendant's Answer.

b. Disclosures pursuant to FED. R. CIV. 26(a)(1) to be made by **April 17, 2008**.

All fact discovery to be commenced in time to be completed by **September 1, 2008**.

c. The parties expect they will need approximately **8** depositions.

d. Reports from retained experts under Rule 26(a)(2) due:

from plaintiff(s) by September 30, 2008.

from defendant(s) by **October 30, 2008**.

All expert witness depositions to be commenced in time to be completed by **December 31, 2008**

- e. All potentially dispositive motions should be filed by **January 15, 2009**.
- f. Final pretrial order: Plaintiff to prepare proposed draft by **February 15, 2009**; parties to file joint final pretrial order by **February 28, 2009**.
- g. The case should be ready for trial by **March 1, 2009** and at this time is expected to take approximately **two days**.

3. **Settlement.** At least 14 days prior to the Rule 16(b) scheduling conference, plaintiff(s) is directed to make a written settlement demand to the defendant(s). At least 7 days prior to the scheduling conference defendant(s) is to respond in writing to the plaintiff's settlement demand.

4. **Consent.** Parties **do not** consent unanimously to proceed before a Magistrate Judge.

Respectfully submitted,

ASHLAND INC.

By: /s/ Victor J. Pioli
One of Its Attorneys

Joseph R. Marconi
Victor J. Pioli
Johnson & Bell, Ltd.
33 West Monroe Street,
Suite 2700
Chicago, IL 60603
Ph: (312) 372-0070
Fax: (312) 372-9818

Chuck M. Roesch
Kathleen A. Carnes
Dinsmore & Shohl LLP
1900 Chemed Center
255 East Fifth Street
Cincinnati, Ohio 45202
Ph: (513) 977-8200